Public Health Data Systems Hearing, AIRA Comments
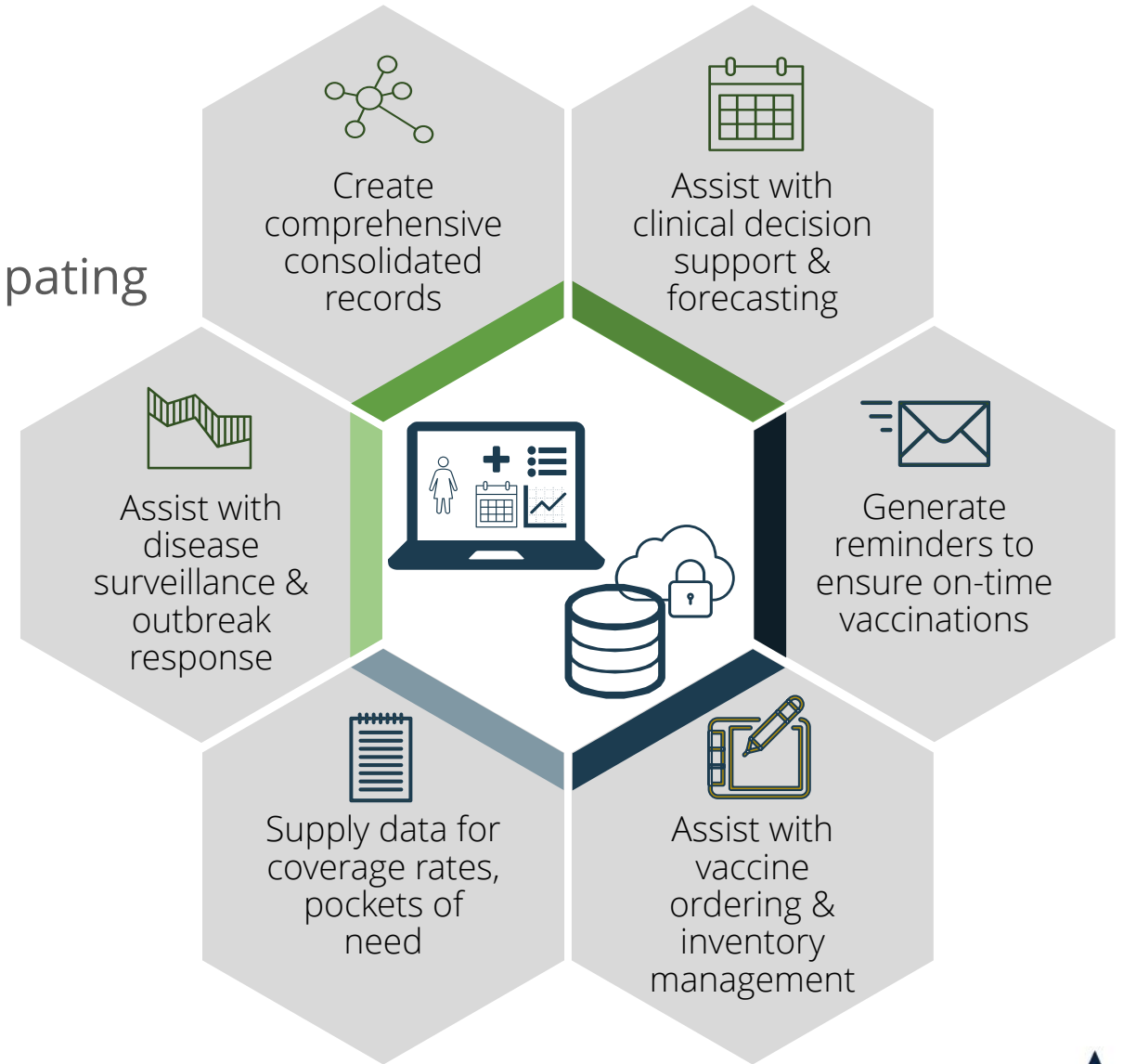
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IIS Background

IIS are confidential, population-based, computerized databases that record all immunization doses administered by participating providers to persons residing within a given geopolitical area

- **63 IIS** across the US
- Use well-adopted standard of **HL7 V2** messaging
- Governed by **local law and policy**
- Pre-covid (in 2019), there were nearly **117,000 active interfaces**, most supporting both submission and query (now up ~25%)
  - Average submissions per IIS: **17,000/day**
  - Average queries per IIS: **32,000/day**

Create comprehensive consolidated records

Assist with clinical decision support & forecasting

Assist with disease surveillance & outbreak response

Generate reminders to ensure on-time vaccinations

Supply data for coverage rates, pockets of need

Assist with vaccine ordering & inventory management

Strengths of the COVID-19 Response

IIS were able to consistently:

- leverage existing interfaces with private and public provider sites on day 1 when vaccine arrived
- onboard abundant new immunizing sites, particularly non-traditional partners
- submit nation-wide record-level (redacted) data to CDC daily
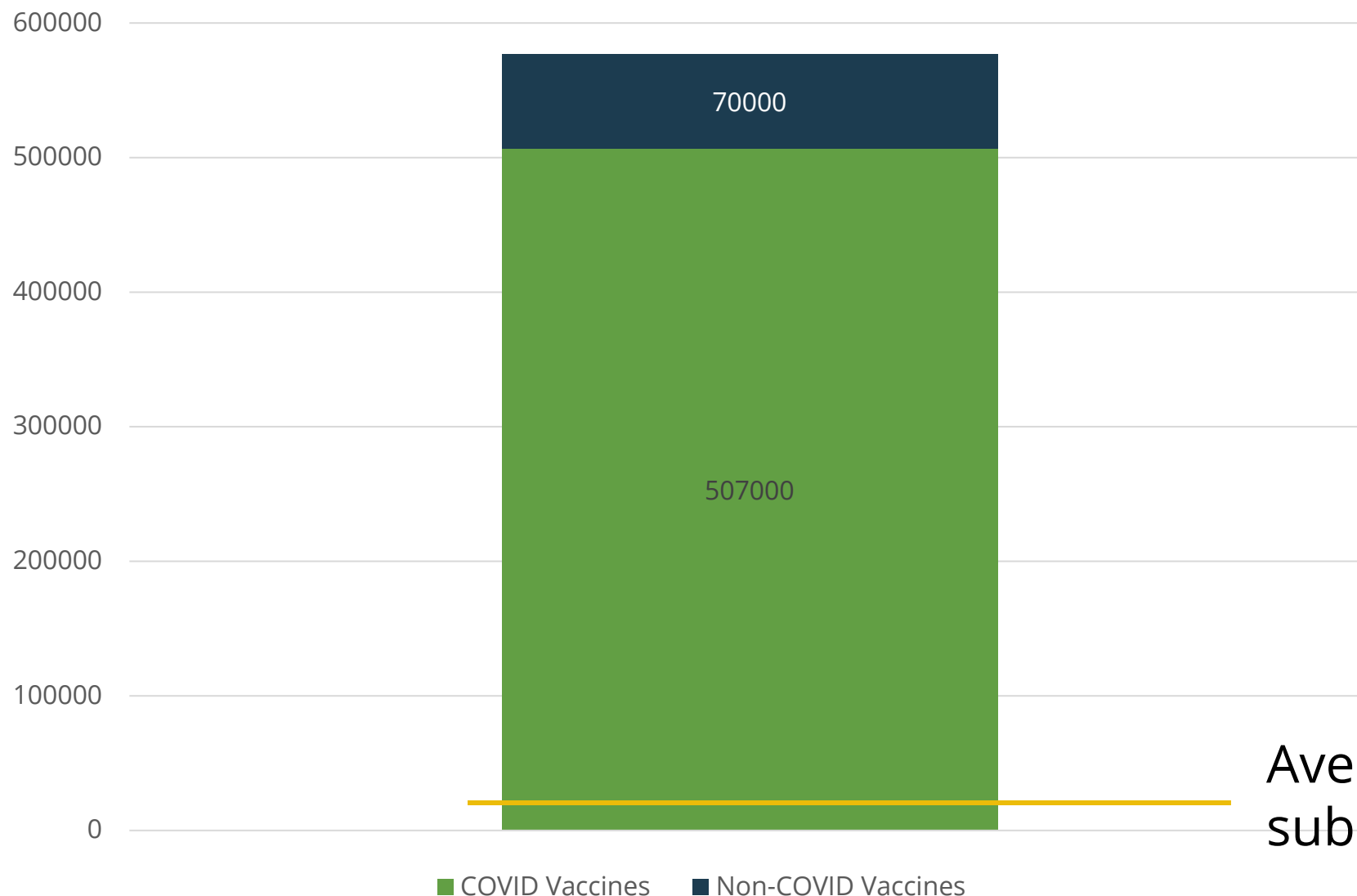- test the concept of a broad, nation-wide reporting mandate

Gaps and Challenges

Despite broad gains in standardization:

- some variation persists that slows interoperability
  - Modifiable (e.g., standards constraints) vs. necessary variation (e.g., consent laws)
  - Onboarding processes
- data to support health equity challenges is not yet complete and available (e.g., race, ethnicity)
  - IIS can influence this, but shared responsibility
- IIS processing capacity needs to continue to expand

Snapshot of Growth in Volume of Daily Submissions:

One IIS Experience

Average pre-COVID daily submissions = **17,000**

Chart data:
- 70000 (Non-COVID Vaccines)
- 507000 (COVID Vaccines)

Legend:
■ COVID Vaccines ■ Non-COVID Vaccines

Looking Forward

Immediate Needs

- **Guidance** on topics like vaccine credentials to support standardization
- Support and expand **third party testing** to minimize IIS variation
- **Expand incentive programs** to promote best practices (e.g., reviewing, acting on acknowledgements, consuming immunizations)
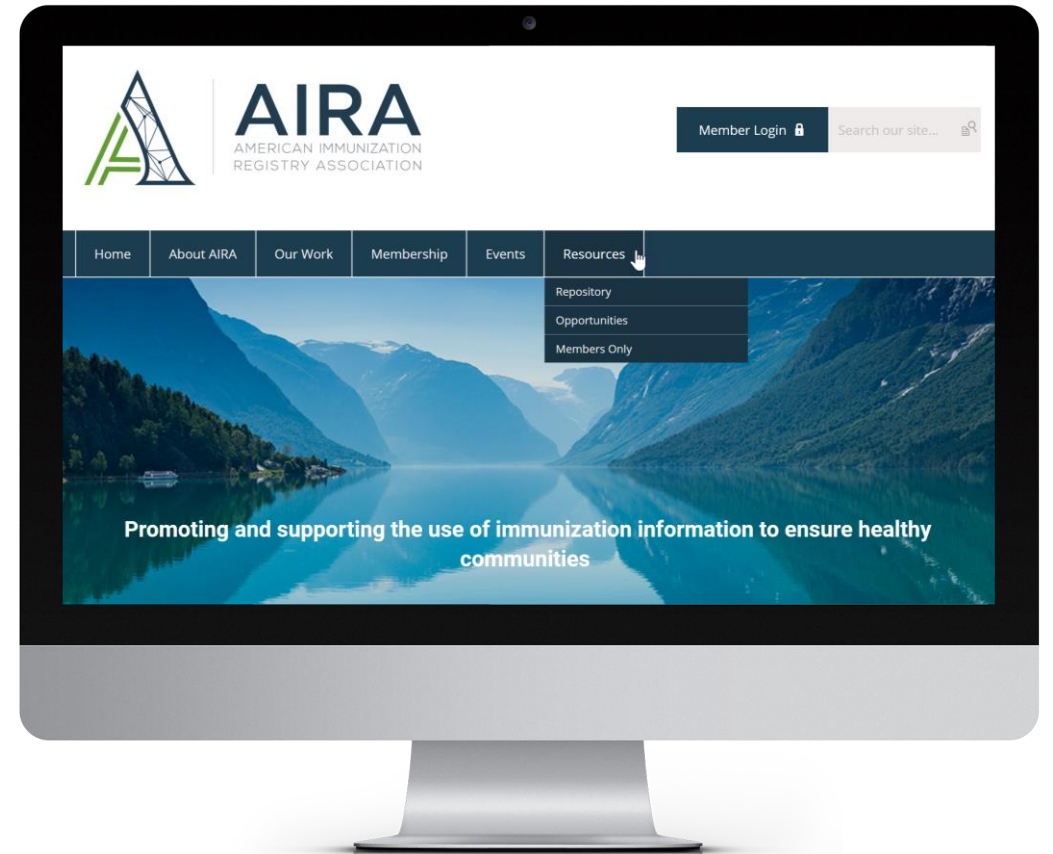
Longer Term Needs

- **National policy framework** to increase standardization
- Consider where **FHIR** could support new messaging, and plan strategic transition
- Sustainable, dedicated **funding** to support long-term planning to **modernize** and **maintain** national network of IIS

Thank You

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